

**REMARKS/ARGUMENTS**

Claims 26-77 were pending in the application of which claims 26 and 51 were independent claims. Claims 26, 27, 51-58, and 77 have been amended above. The amended claims are fully supported by the specification and add no new subject matter. No claims have been added or cancelled. Accordingly, claims 26-77 are still pending of which claims 26 and 51 are independent claims.

**Amendments to the Specification:**

Claims 26, 27, 51-58, and 77 have been amended above. The Action indicated that “foreign language” was deemed indefinite as it could refer to any language. For clarity Applicant has replaced the word “foreign” with the word “source”. Applicant has also amended claims 26 and 51 to further define the invention as indicated above. Applicant believes that the amendments do not add new matter and are fully supported by the original specification. Applicant refers to paragraphs [0067] – [0092] of the specification as support for the amendments.

**Objections to the Title:**

Paragraph 1 of the Action objects to the Specification because the title of the invention is not descriptive. Accordingly, the Applicant has amended the Title to better recite the invention to which the claims are directed. Thus, Applicant respectfully asserts that the amended Title is clearly descriptive of the claimed invention.

Applicant respectfully requests that the objection to the Title of the Invention be withdrawn. If the presently amended Title is not acceptable, Applicant respectfully request a suggested new Title in the next Communication from the Office.

**Claim Rejections Under § 112:**

Paragraph 3 of the Action rejects claims 27 and 51-77 under U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that Applicants regard as the invention. Although, the Applicant believes that the original pending claims were sufficiently definite, the Applicant has amended claims 26, 27, 51-58, and 77 as indicated above. Therefore the rejection of claims 26, 27, 51-58, and 77 is moot. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 27 and 51-77.

**Claim Rejections Under § 103:**

Paragraph 5 of the Office Action rejects claims 26-30, 32, 33, 34, 41, 42, 43, 49, 50, 51, 54, 56, 57, 58, 59, 60, 67, 68, 69, 75 and 76 under 35 U.S.C. § 103(a) as allegedly being obvious over Andersen (U.S. 7,240,062B2) in view of Syeda-Mahmood (U.S. 5,953,451). With respect to claims 26-30, 32, 33, 34, 41, 42, 43, 49, 50, 51, 54, 56, 57, 58, 59, 60, 67, 68, 69, 75 and 76, Applicant respectfully traverses the rejection because Andersen in further view of Syeda-Mahmood fails to make out a *prima facie* case of obviousness.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the

prior art, and not based on applicant's disclosure. *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

In order to allege a claim is obvious when references are combined under 35 U.S.C. 103(a) the combination must teach each and every limitation of the claim. In this case, the rejection must fail because Andersen and Syeda-Mahmood alone or in combination, fail to teach each and every element of the claims as amended.

Certain embodiments disclosed in the present application are directed to a system for searching documents in a source language. For example, claim 26 (as amended) is directed to “an image recognition system for searching documents in a source language comprising: an imaged document, the imaged document being stored in a document database; a source language library for storing source language search terms; an image graph constructor coupled to the document database and the source language library, the image graph constructor configured to generate search term image graphs that include a vertex and an edge from the source language search terms, and generate a collection of image graphs representing the imaged document; an image graph database for storing the search term image graphs and the collective of image graphs generated by the image graph constructor; and a comparison module coupled to the image graph database, the comparison module configured to search the imaged documents by comparing the collection of image graphs with selected search terms image graphs; wherein if at least one image graph from the collection or image graphs matches the selected search term image graphs, the imaged document is flagged as containing a search term justifying further analysis of the document.”

The Action states that Anderson in view of Syeda-Mahmood teaches every element of claim 26. The Applicant disagrees. Specifically, Anderson fails to teach or suggest an “imaged document being **stored in a document database.**” Instead, Andersen only discloses that after the imaged document is obtained the document is reduced into image segments corresponding to individual words while in memory. (See Andersen, column 3 line 23-39, and Figure 5 numeral 504). Moreover, the Action specifically points out that *“Anderson does not disclose an image graph constructor coupled to the document database and the source language library, the image graph constructor configured to generate search term image graphs from the source language search terms, and generate a collection of image graphs representing the imaged document; an image graph database for storing the search term image graphs and the collection of image graphs generated by the image graph constructor; and a comparison module coupled to the image graph database, the comparison module configured to search the imaged documents by comparing the collection of image graphs with selected search terms image graphs; wherein if at least one image graph from the collection of image graphs matches the selected search term image graphs, the imaged document is flagged as containing a search term justifying further analysis of the document.”*

Syeda-Mahmood fails to cure the deficiencies of Andersen as Syeda-Mahmood is also **completely silent** as to an imaged document being **stored in a document database.** Moreover, Syeda-Mahmood fails to teach a “**...comparison module** configured to search the imaged documents by **comparing the collection of image graphs with selected search terms image graphs;** wherein **if at least one image graph from the collection**

of image graphs matches the selected search term image graphs, the imaged document is flagged as containing a search term justifying further analysis of the document.” Instead, Syeda-Mahmood specifically teaches that word segment features (e.g., curves, corners, etc.) extracted (by taking an image of the word segment and capturing the edges around each “connected component” region within the image to detect corners and identify curves as the connectors from corner to corner) from the imaged document are converted into basis triple and affine coordinates that are organized (i.e., abstracted) into a “Hash Table” that “is used to succinctly represent information in the position of features in curves in curve groups in a manner that helps locate a query handwritten word.” That is, the **basis triple and affine coordinates of the search term** are **matched (i.e., indexed) against a Hash Table** (containing the basis triple and affine coordinate data for **ALL** the word segments in the document) to determine the location of the search term in the document (See Syeda-Mahmood, Figure 5A, 5B, and 6; col. 5, line 15-25, col. 6, line 9 to col. 7, line 10; col. 7, lines 30-64).

After the location of the search term is matched, the image of the search term is overlaid on top of the suspected location of the search term on the document and a **USER** is asked to verify whether the match is valid (See Syeda-Mahmood, Figure 7, col. 8, lines 28-47). Therefore, Syeda-Mahmood **CANNOT** teach “**...comparing the collection of image graphs with selected search terms image graphs; wherein if at least one image graph from the collection of image graphs matches the selected search term image graphs, the imaged document is flagged as containing a search term...**” There simply is no matching of image graphs, just matching of mathematical coordinates (e.g. basis triple and affine coordinate data) taught in Syeda-Mahmood. That

is, there is no teaching or suggestion of creating graphs which are based on the centerline and not the contour of the connected components. Or, that the topology of these graphs are encoded into a unique identifier that represents the topology that serves as the basis for the alignment of physical features.

Therefore, Andersen and Syeda-Mahmood alone or in combination, fail to teach every element of claim 26.

Accordingly, Applicant respectfully requests that the rejection be withdrawn for claim 26. Claims 27-30, 32, 33, 34, 41, 42, 43, 49, and 50 depend directly or indirectly off of claim 26 and are therefore allowable for at least the same reasons as discussed with respect to claim 26. Accordingly Applicants respectfully requests that the rejection be withdrawn for claims 26-30, 32, 33, 34, 41, 42, 43, 49, and 50.

Similarly, in reference to claim 51 (as amended herein), the Action specifically states that Andersen fails to disclose “...searching the imaged document by **comparing the collection of image graphs to inputted search term image graphs**; and flagging imaged documents when an image graph from the collection of image graphs matches one of the selected search term image graphs.” Syeda-Mahmood fails to cure the deficiencies of Andersen for at least the same reasons as those discussed with respect to claim 26. Specifically, there simply is no matching of image graphs, just matching of mathematical coordinates (e.g. basis triple and affine coordinate data) taught in Syeda-Mahmood.

Therefore, Andersen and Syeda-Mahmood alone or in combination, fail to teach every element of claim 51.

Accordingly, Applicant respectfully requests that the rejection be withdrawn for claim 51. Claims 54, 56, 57, 58, 59, 60, 67, 68, 69, 75 and 76 depend directly or indirectly off of claim 51, and are therefore allowable for at least the same reasons as discussed with respect to claim 51. Accordingly Applicants respectfully requests that the rejection be withdrawn for claims 51, 54, 56, 57, 58, 59, 60, 67, 68, 69, 75 and 76.

Paragraph 6 of the Office Action rejects claims 31 and 52 under 35 U.S.C. § 103(a) as allegedly being obvious over Andersen in view of Syeda-Mahmood, in further view of Loudon (US 6,556,712 B1). With respect to claims 31 and 52 Applicant respectfully traverses the rejection because Andersen in view of Syeda-Mahmood, in further view of Loudon fails to make out a *prima facie* case of obviousness.

As stated above, Andersen in view of Syeda-Mahmoo fail to teach every element of claims 26 and 51. Claim 31 depends on claim 26 and claim 52 depends on claim 51, and therefore claims 31 and 52 are allowable for at least the same reasons as discussed with respect to claims 26 and 51, unless Loudon makes up for these deficiencies which it does not. Accordingly Applicants respectfully requests that the rejection be withdrawn for claims 31 and 52.

Paragraph 7 of the Office Action rejects claims 35-40, 44-48, 61-66, 70-74, and 77 under 35 U.S.C. § 103(a) as allegedly being obvious over Andersen in view of Syeda-Mahmoo, in further view of Krtolica (US 5,719,959). With respect to claims 35-40, 44-48, 61-66, 70-74, and 77, Applicant respectfully traverses the rejection because Andersen in view of Syeda-Mahmood, in further view of Krtolica fails to make out a *prima facie* case of obviousness.

As stated above, Andersen in view of Syeda-Mahmoo fail to teach every element of claims 26 and 51. Claims 35-40 and 44-48 depends on claim 26, and claims 61-66, 70-74, and 77 depend on claim 51. Therefore claims 35-40, 44-48, 61-66, 70-74, and 77 are allowable for at least the same reasons as discussed with respect to claims 26 and 51, unless Krtolica makes up for these deficiencies which it does not. Accordingly Applicants respectfully requests that the rejection be withdrawn for claims 35-40, 44-48, 61-66, 70-74, and 77.

Paragraph 8 of the Office Action rejects claims 53 and 55 under 35 U.S.C. § 103(a) as allegedly being obvious over Andersen in view of Syeda-Mahmoo, in further view of Appleby (US 2005/0015240 A1). With respect to claims 53 and 55 Applicant respectfully traverses the rejection because Andersen in view of Syeda-Mahmood, in further view of Appleby fails to make out a *prima facie* case of obviousness.

As stated above, Andersen in view of Syeda-Mahmoo fail to teach every element of claims 51. Claims 53 and 55 depend on claim 51, and therefore claims 53 and 53 are allowable for at least the same reasons as discussed with respect to claim 51, unless Appleby makes up for these deficiencies, which it does not. Accordingly Applicants respectfully requests that the rejection be withdrawn for claims 53 and 55.

## CONCLUSION

Based on the above amendments and remarks, Applicant believes that the claims are in condition for allowance and such is respectfully requested. Applicant believes that no additional fees are necessitated by this response. The Commissioner is hereby authorized to charge any additional fees required by this response to our Deposit Account No. **13-0480** (Attorney Docket No. 67182005-002000).

Respectfully Submitted,

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